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19 DeVRY EDUCATION GROUP INC.,  
20 DeVRY UNIVERSITY, INC. and  
21 DeVRY/NEW YORK INC.

12  
13  
14 **UNITED STATES DISTRICT COURT**  
15 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

16 FEDERAL TRADE COMMISSION,

17 Case No. 16-CV-579-MWF-SS

18 Plaintiff,

19 v.

20 DeVRY EDUCATION GROUP  
21 INC., formerly known as DeVry  
22 Inc., a corporation;

23 DeVRY UNIVERSITY, INC., a  
24 California corporation; and

25 DeVRY/NEW YORK INC., a  
26 corporation;

27 Defendants.

28 **INTERIM STIPULATION  
REGARDING CONFIDENTIAL  
DOCUMENTS AND INFORMATION**

1 Plaintiff Federal Trade Commission (“FTC”) and Defendants DeVry  
2 Education Group Inc., DeVry University, Inc., and DeVry/New York Inc. enter into  
3 this Interim Stipulation governing the handling of confidential information produced  
4 by the FTC to Defendants until such time as a Protective Order is entered by the  
5 Court. This Stipulation is necessary because the FTC’s response to Defendants’ First  
6 Set of Document Requests is due on August 24, 2016. The Parties are currently in  
7 the process of negotiating a Protective Order in this matter, which will be submitted  
8 to the Court for its approval and which will protect, among other things, confidential  
9 information contained in documents produced by the FTC, but such Protective Order  
10 will not be finalized and entered by the Court before the FTC’s production is due.  
11 Therefore, the Parties enter into this Stipulation in order to protect the confidentiality  
12 of documents and information that will be produced by the FTC in response to  
13 Defendants’ First Set of Document Request until such Protective Order has been  
14 agreed upon and entered by the Court.

15 Pursuant to this Stipulation, Defendants agree not to publically file or  
16 otherwise publicly disclose any document or information produced by the FTC to  
17 Defendants that the FTC designates confidential. Nothing herein shall bar review of  
18 such confidential document or information by Defendants’ employees, Defendants’  
19 outside counsel or retained experts, or those working under such counsel’s or  
20 expert’s supervision who agree not to disclose such confidential document or  
21 information to anyone not permitted by this Stipulation to review such confidential  
22 document or information.

23 This Stipulation will be superseded by the aforementioned Protective Order,  
24 once it is issued by the Court, at which time this Stipulation will cease to have any  
25 further force or effect.

KAYE|SCHOLER LLP

1 Dated: August 24, 2016  
2

KAYE SCHOLER LLP

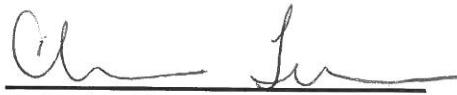
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